

January 29, 2004

To whom it may concern:

RE: Dockets R-1167, R-1168, R-1169, R-1170, and R-1171

We strongly urge the Board not to adopt the proposal for the New Clear and Conspicuous Requirements for many reasons.

The new requirements are unclear and leave too much question as to which disclosures a bank should apply the proposed changes to. Stating that the examples are "optional" is sure an open book to pending lawsuits. Changes in margins, spacing and bullet points will ultimately require revamping of all disclosures, which could increase the length of each disclosure adding new costs, which banks will have to absorb. If the lengthened form is a record able document, the additional expense will also affect the customer in recording costs.

Increasing the length of the disclosures by pages will make the consumers even more unlikely to read, which in the end, defeats the purpose of providing disclosures to the customer.

I guess to sum it up, as there is no current problem with existing regulations and disclosures that has been identified to support such changes, these changes would be a compliance burden and add potential liability to each bank.

In other words, if it isn't broke, don't fix it!!!

Thank You!

***Debra R Beatty
Springs Valley Bank & Trust Company
Assistant Vice President
Loan Compliance & Application Support
#812-634-4832
mailto:dbeatty@svbt.com***